

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
DOCKET No. SUCV2004-02264

ABRAHAM PHILIP, M.D.
Plaintiff,

v.

DR. RICHARD EVANS M.D., in his official and
personal capacity, EDWARD FLYNN, in his
personal and official capacity, and THE
COMMONWEALTH OF MASSACHUSETTS
Defendants.

FURTHER ANSWERS OF DEFENDANT DR. RICHARD EVANS MD TO PLAINTIFF'S
INTERROGATORIES NO. 9 AND 14

INTERROGATORY #9

Please state the date and the time when your first learned, read, heard, or were otherwise informed that Dr. Philip wrote to the Governor of the Commonwealth on March 1, 2004 regarding any matter pertaining to the OCME, stating the manner in which you first learned, read, or heard that such communication had taken place and the name of the person from whom you first received such information.

ANSWER #9

On March 1, 2004 Attorney Elaine Whitfield Sharp sent a copy of a letter addressed to Governor Mitt Romney to John Cronin via facsimile. Mr. Cronin informed me of the existence of this letter shortly after he received it.



FURTHER ANSWER #9

On March 1, 2004 Attorney Elaine Whitfield Sharp sent a copy of a letter addressed to Governor Mitt Romney to John Cronin via facsimile. The letter to the Governor was dated March 1 and referred to "Problems at the Office of the Chief Medical Examiner." Mr. Cronin informed me of the existence of this letter shortly after he received it.

On March 3, 2004 Attorney Elaine Whitfield Sharp sent a copy of a second letter addressed to Governor Mitt Romney to John Cronin via facsimile. The letter to the Governor was dated March 1 and referred to "Organ Procurement: Procedures of Concern." Mr. Cronin informed me of the existence of this letter shortly after he received it.

SECOND FURTHER ANSWER #9

On March 1, 2004 Attorney Elaine Whitfield Sharp sent a copy of a letter addressed to Governor Mitt Romney to John Cronin via facsimile. The letter to the Governor was dated March 1 and referred to "Problems at the Office of the Chief Medical Examiner." Mr. Cronin informed me of the existence of this letter shortly after he received it.

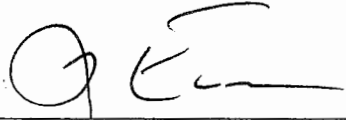
On March 3, 2004 Attorney Elaine Whitfield Sharp sent a copy of a second letter addressed to Governor Mitt Romney to John Cronin via facsimile. The letter to the Governor was dated March 1 and referred to "Organ Procurement: Procedures of Concern." Mr. Cronin informed me of the existence of this letter shortly after he received it.

I do not know the exact time that Mr. Cronin informed me of the existence of either letter. I cannot with any certainty say whether it was the same day that the letters were received, within a week, or within two weeks.

INTERROGATORY #14

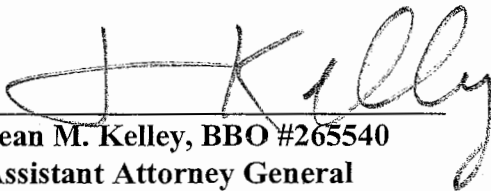
Please describe, to the best of your ability, each and every written or oral grievance, complaint, or negative comment you received about the Plaintiff from any person from calendar year 200 through the end of his employment at the OCME, stating (a) the substance of the complaint or comment, (b) who made the complaint or comment, (c) the date on which such comment was made, and (d) whether you memorialized or recorded the comment in any way, whether through writing, tape recording, or any other means.

Signed under the penalties of perjury this 25 day of July, 2005.



Dr. Richard Evans

AS TO OBJECTIONS:



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